

EPA Region 5 Records Ctr.



302560

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

THE STATE OF ILLINOIS,
ex rel. LISA MADIGAN, Attorney
General of the State of Illinois

Plaintiffs,

v.

ABRASIVE MACHINING, INC.,
AMERICAN SHAFT CO.,
AMEROCK CORPORATION,
ANDERSON GARAGE, INC.,
BEROL USA,
BORGWARNER INC. (formerly BORG-WARNER
CORPORATION),
CATERPILLAR INC.,
COMMONWEALTH EDISON COMPANY,
COUNSELOR COMPANY,
DAIMLERCHRYSLER CORPORATION,
DANA CORPORATION (WARNER
ELECTRIC),
ELCO INDUSTRIES, INC.,
ENPRO INDUSTRIES, INC., (f/w/a BFGoodrich Company)
for Coltec Ind.),
EXXONMOBIL CORPORATION,
GATES CORPORATION d/b/a Gates Rubber Co.,
GENERAL MOTORS CORPORATION,
GTE COMMUNICATION SYSTEMS CORP.,
HAMILTON SUNDSTRAND CORPORATION,
HONEYWELL, INC.,
IKON OFFICE SOLUTIONS, INC.,
J.L. CLARK MANUFACTURING CO./CLARCOR
KELSEY-HAYES COMPANY,
MODERN METAL PRODUCTS CO.,
PATTEN INDUSTRIES, INC.,
PIERCE CHEMICAL COMPANY,
THE QUAKER OATS COMPANY,
QUEBECOR WORLD MT. MORRIS INC. (Kable
Printing),
RB&W MANUFACTURING, LLC, f/w/a RB&W
Corporation, and Park-Ohio Industries, Inc.,

Post-it® Fax Note	7671	Date	6/7/06	# of pages	7
To	Ross DeRosario	From	Doyle Wilson		
Co./Dept.		Co.	IEPA		
Phone #	312-886-6195	Phone #			
Fax #	312-353-4071	Fax #			

886

Judge Gettleman

RECEIVED
NOV 29 2005
IEPA/BOL/WRCs

ROCKFORD BLACKTOP CONSTRUCTION CO.,)
ROCKFORD DROP FORGE,)
ROCKFORD PRODUCTS CORPORATION,)
SAWS INTERNATIONAL, Inc.,)
TEXTRON INC.,)
THOMAS INDUSTRIES INC.,)
TWIN DISC, INCORPORATED,)
THE VALSPAR CORPORATION,)
WARNER-LAMBERT CO., INC.,)
WHITE CONSOLIDATED INDUSTRIES, INC.,)
WOODWARD GOVERNOR COMPANY,)
Defendants.)

**UNOPPOSED MOTION OF THE STATE OF ILLINOIS
FOR ENTRY OF CONSENT DECREE AND TO ADD ADDITIONAL
SIGNATORIES**

Plaintiff, the State of Illinois ("Illinois"), hereby moves this Court for entry of the Consent Decree that is attached hereto. In support of this Unopposed Motion, Illinois states as follows:

1. On July 15, 2005, Illinois filed a complaint under the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9601 et seq. ("CERCLA"), against the above named Defendants ("Settling Defendants"), seeking the recovery of response costs and an injunction regarding a Superfund site located in Rockford, Illinois.
2. On the same day as the filing of the complaint, Illinois moved to lodge a Consent Decree among Illinois and the Settling Defendants that fully resolved the claims in the complaint.
3. On July 27, 2005, this Court, Reinhard, J., granted the Illinois' Motion to Lodge the Consent Decree. (This matter has subsequently been re-assigned by Order of the Executive Committee to Judge Gettleman).

EXHIBIT D: SETTLING DEFENDANTS

Abrasive Machining, Inc.
American Shaft Co.
Amerock Corporation
Anderson Garage, Inc.
Berol USA
BorgWarner Inc.
Caterpillar Inc.
Commonwealth Edison Company
Counselor Company
DaimlerChrysler Corporation
Dana Corporation (Warner Electric)
Elco Industries, Inc.
EnPro Industries, Inc. f/k/a BFGoodrich Company (for Coltec Ind.)
Exxon Mobil Corporation
Gates Corporation d/b/a Gates Rubber Co.
General Motors Corporation
GTE Communication Systems Corp.
Hamilton Sundstrand Corporation
Honeywell Inc.
IKON Office Solutions, Inc.
J.L. Clark Manufacturing Co./Clarcor
Kelsey-Hayes Company
Modern Metal Products Co.
Patten Industries, Inc.
Pierce Chemical Company
Quaker Oats Company (The)
Quebecor World Mt. Morris Inc. (Kable Printing)
RB&W Manufacturing, LLC, f/k/a RB&W Corporation, and Park-Ohio Industries, Inc.
Rockford Blacktop Construction Co.
Rockford Drop Forge
Rockford Products Corporation
Saws International, Inc.
Textron Inc.
Thomas Industries Inc.
Twin Disc, Incorporated
Valspar Corporation (The)
Warner-Lambert Co., Inc.
White Consolidated Industries, Inc.
Woodward Governor Company

EXHIBIT D1: PERFORMING SETTling DEFENDANTS

BorgWarner Inc.
Dana Corporation (Warner Electric)
Elco Industries, Inc.
Hamilton Sundstrand Corporation
IKON Office Solutions, Inc.
Kelsey-Hayes Company
Textron Inc.

EXHIBIT D2: PARTIAL CASHOUT SETTLING DEFENDANTS

Abrasive Machining, Inc.

Caterpillar Inc.

Rockford Products Corporation

EXHIBIT D3: FULL CASHOUT SETTling DEFENDANTS

American Shaft Co.
Amerock Corporation
Berol USA
Commonwealth Edison Company
Counselor Company
DaimlerChrysler Corporation
EnPro Industries, Inc. f/k/a BFGoodrich Company (for Coltec Ind.)
Exxon Mobil Corporation
Gates Corporation d/b/a Gates Rubber Co.
General Motors Corporation
GTE Communication Systems Corp.
Honeywell Inc.
J.L. Clark Manufacturing Co./Clarcor
Modern Metal Products Co.
Patten Industries, Inc.
Pierce Chemical Company
Quaker Oats Company (The)
Quebecor World Mt. Morris Inc. (Kable Printing)
RB&W Manufacturing, LLC, f/k/a RB&W Corporation, and Park-Ohio Industries, Inc.
Rockford Blacktop Construction Co.
Rockford Drop Forge
Saws International, Inc.
Thomas Industries Inc.
Twin Disc, Incorporated
Valspar Corporation (The)
Warner-Lambert Co., Inc.
White Consolidated Industries, Inc.
Woodward Governor Company

EXHIBIT E: OWNER SETTLING DEFENDANTS

Anderson Garage, Inc.